

# EXHIBIT A

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DEFINITIONS

1. “Micrilor” means Micrilor, Inc., its subsidiaries and affiliates, and their officers, directors, attorneys and agents.
2. “Proxim” means Proxim Wireless Networks, Inc., its predecessor Proxim Inc., its parent corporation, Proxim Corporation, and its subsidiaries and affiliates, and their officers, directors, attorneys and agents.
3. “Symbol” means Symbol Technologies Inc., its subsidiaries and affiliates, and their directors, attorneys and agents.
4. “The ‘449 patent” means U.S. Patent No. 6,473,449 and all patent applications leading thereto.
5. “The ‘060 patent” means U.S. Patent No. 5,809,060 and all patent applications leading thereto.
6. “The ‘812 patent” means U.S. Patent No. 6,075,812 and all patent applications leading thereto.

REQUESTS FOR PRODUCTION

1. All documents (including but not limited to notebooks, memorandum, and reports) obtained from Proxim concerning the conception, development and reduction to practice of the subject matter of the '449 patent.
2. All documents obtained from Proxim concerning the prosecution of the applications leading to the '060, '812 or '449 patent.
3. All documents obtained from Proxim concerning the ownership, assignment, transfer or licensing of the '060, '812 or '449 patent.

4. All documents obtained from Proxim concerning any security agreements concerning the '060, '812 or '449 patent.

5. All documents obtained from Proxim constituting or concerning communications with Symbol concerning the '060, '812 or '449 patent.

6. All documents obtained from Proxim constituting or concerning any agreements with Symbol concerning the '060, '812 or '449 patent.

7. All prior art to, or cited against, the '060, '812 or '449 patent.

8. All documents obtained from Proxim concerning any contention made by any third party, including Symbol, as to the invalidity, unenforceability or noninfringement of the '060, '812 or '449 patent.

9. All documents obtained from Proxim concerning any judicial or administrative proceedings concerning the '060, '812 or '449 patent.

10. All documents obtained from Proxim constituting or concerning the Small Business Innovation Research (SBIR) grant, including without limitation unredacted versions of the initial proposal and final report referred to in the February 13, 1997 Declaration of Jeffrey R. Fischer (the "Fischer Declaration") submitted in support of Appl. S.N. 08/369,778 (attached hereto as Tab 1).

11. All documents obtained from Proxim concerning the development, demonstration, or distribution of the computer-simulated system referred to in the Fischer Declaration.

12. All documents obtained from Proxim concerning the development, demonstration, or distribution of the printed circuit board referred to in the Fischer Declaration.

13. All documents obtained from Proxim constituting or concerning Disclosure Document No. 331,998, which was referenced in the prosecution history for abandoned Appl. S.N. 08/198,138 filed February 17, 1994 entitled "High Data Rate Wireless Local Area Network" and assigned to Micrilor, as well as in the Fischer Declaration.

14. All documents obtained from Proxim constituting or concerning any communication or agreement with Micrilor, Inc., John H. Cafarella or Jeffrey H. Fischer.

15. All documents obtained from Proxim concerning any participation by Proxim or Micrilor (or by employees or representatives thereof) in any IEEE standards proceedings relating to the subject matter of the '060, '812, or '449 patents.

16. All documents obtained from Proxim constituting or concerning any communications between Proxim or Microlir (or representatives thereof) and the IEEE (or representatives thereof) regarding the subject matter of the '060, '812, or '449 patents, or the licensing of said patents.

17. All documents obtained from Proxim concerning any participation by Proxim or Micrilor, or their employees or agents, relating to the proposed or adopted IEEE 802.11, 802.11b or 802.11g standards including, but not limited to, documents concerning the applications that resulted in the '449 Patent.

18. All documents obtained from Proxim concerning Proxim's, or Micrilor's, collaboration with the Massachusetts Institute of Technology's ("MIT") Lincoln Laboratory, including documents concerning the Lincoln Laboratory's use of the Matlab computer simulation program and code discussed in the Fischer Declaration and in the SBIR Final Report entitled "High-Data-Rate Wireless LAN for Tactical Multimedia Networks," documents concerning any use by the Lincoln Laboratory of the technology discussed in said Final Report,

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documents concerning or constituting an offer to sell the technology (or products practicing the technology) discussed in said Final Report to the Lincoln Laboratory, and documents concerning or constituting any agreements between Proxim or Micrilor, and MIT.